



A10-0009 7/9/01

***National
Environmental
Achievement Track
Application Form***

Simpson Tacoma Kraft Company

Name of facility

same

Name of parent company (if any)

801 Portland Avenue

Street address

n/a

Street address (continued)

Tacoma/WA/98421

City/State/Zip code

Give us information about your contact person for the
National Environmental Achievement Track Program.

Name Gregory Narum

Title Environmental Manager

Phone 253-596-0234

Fax 253-596-0142

E-mail gnarum@simpson.com

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.

Section A

Tell us about your facility.

1 What do you do or make at your facility?

Manufacture bleached and unbleached pulp and paper from wood chips and recycled fiber.

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC
2611 2631

NAICS
3221

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes

☒ No

4 How many employees (full-time equivalents) currently work at your facility?

☐ Fewer than 50

☐ 50-99

☐ 100-499

☒ 500-1,000

☐ More than 1,000

Section A, continued

5 Does your facility have an EPA ID number(s)?

☒ Yes

☐ No

If yes, list in the right-hand column.

WAD082510595

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right **or** enclose a completed Checklist with your application.

see Checklist

7 Check the appropriate box in the right-hand column.

☐ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

Simpson Tacoma Kraft was a participant in EPA's pilot Environmental Leadership Program. Performance Track seems to have several elements in common with ELP.

Section B

Tell us about your EMS.

Why do we need this information?

Facilities need to have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

a. Environmental policy

☒ Yes

b. Planning

☒ Yes

c. Implementation and operation

☒ Yes

d. Checking and corrective action

☒ Yes

e. Management review

☒ Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)?

☒ Yes

3 Did this cycle include both an EMS and a compliance audit?

☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS?

☒ Yes

If yes, what method of EMS assessment did you use?

☐ Self-assessment

☐ GEMI

☐ Other

☐ CEMP

☒ Third-party assessment

☐ ISO 14001 Certification

☒ Other EMS was evaluated as part of ELP. No standard assessment protocol was used.

Why do we need this information?

Facilities need to show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

Section C

Tell us about your past achievements and future commitments.

- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you need to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Discharges of Toxics to Water (measured as AOX)	123,600	lbs/year	63,500	lbs/year
<p>i. How is the current level an improvement over the previous level?</p> <p>AOX is a measure of chlorinated organic by-products discharged from the chemical bleaching of pulp. The mill made process improvements which resulted in reducing production of these compounds from 0.92 to 0.47 kg/air dry metric ton of pulp.</p> <p>ii. How did you achieve this improvement?</p> <p>The main change was to increase the substitution of chlorine dioxide for chlorine used in the first bleaching stage from 85% to 100%. We made this change 2 years earlier than required under the Cluster Rules and went to 100% substitution even though something less would have met Cluster Rule emission requirements. The timing and extent of this change significantly increased our pulp bleaching costs.</p>				

d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.

☒ Option A:
Absolute value 5.84 billion gallons/year
(Quantity/Units)

☐ Option B:
In terms of
units of production (Quantity/Units)
or output

e. How will you achieve this improvement?

Mainly through increased process reuse of water. This will require some substantial expenditures because we have already implemented many less costly projects in reducing water consumption by over 40% in the last 10 years.

Second aspect you've selected

a. What is the aspect?

Emissions of particulate matter.

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value 607 minutes
(Quantity/Units)

☐ Option B:
In terms of
units of production (Quantity/Units)
or output

d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.

☒ Option A:
Absolute value 300 minutes
(Quantity/Units)

☐ Option B:
In terms of
units of production (Quantity/Units)
or output

e. How will you achieve this improvement?

The current and committed levels are measured as total time that #4 Recovery Furnace has unavoidable excess emissions that exceed its opacity standard. These periods are reported monthly as part of our Title V reporting. No data exists to quantify these emissions on a mass per year basis.

To achieve this 50% reduction we propose to substantially rebuild the electrostatic precipitator at a cost of several million dollars. One of the changes will be to change to an improved ash removal mechanism. We will also change the type of combustion air heater so as to reduce the airflow to the precipitor and improve its particulate collection efficiency.

Third aspect you've selected

- a. What is the aspect?
- b. Is this aspect identified as significant in your EMS?
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.
- e. How will you achieve this improvement?

Emissions of Toxic Air Pollutants

☒ Yes ☐ No

☒ Option A:
Absolute value 1323 lb/year
(Quantity/Units)

☐ Option B:
In terms of
units of production (Quantity/Units)
or output

☒ Option A:
Absolute value 1054 lb/year
(Quantity/Units)

☐ Option B:
In terms of
units of production (Quantity/Units)
or output

Untreated noncondensable gases (NCG) are occasionally released because of startups, shutdowns, or malfunctions of the control device. NCGs contain methanol, a toxic air pollutant, and have very strong odor that can be detected in the community. Current and committed levels are computed by multiplying the number of minutes in a year that untreated noncondensable gases (NCG) are vented at the incineration device times source flows and concentrations that were measured in 1999. Venting times are reported monthly in the mill's Title V report.

We propose to institute procedures for reducing venting incidents, which will include shutting down the pulp mill after a certain period of venting. We will also make improvements to the combustion controls and equipment sizing as necessary to achieve the targeted 20% reduction in venting time.

Fourth aspect you've selected

- a. What is the aspect?
- b. Is this aspect identified as significant in your EMS?
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

Hazardous Solid Waste

☒ Yes ☐ No

☒ Option A:
Absolute value 4300 lb/year
(Quantity/Units)

☐ Option B:
In terms of
units of production (Quantity/Units)
or output

d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.

☒ Option A:
Absolute value <2000 lb/year
(Quantity/Units)

☐ Option B:
In terms of
units of production (Quantity/Units)
or output

e. How will you achieve this improvement?

The mill is currently classified as a small quantity hazardous waste generator under RCRA. We propose to further reduce HW generation so that we qualify for Conditionally Exempt generator status. The main HW stream we generate is cleanup solvent from painting, approximately 1400 lbs/year. We plan to explore solvent recovery and solvent alternatives.

Section D

Tell us about your public outreach and reporting.

Why do we need this information?

Facilities need to demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

We periodically hold meetings of a "Community Advisory Group" composed of community leaders and interested citizens to discuss community concerns and prioritize actions. We have a full time Publics Affairs Manager who is active in a wide range of government and citizen outreach and information activities.

2 How do you inform community members of important matters that affect them?

We send out a monthly "Report to the Community" to hundreds of people who have expressed interest. We also work with local media on press releases involving projects of significant interest and impact.

3 How will you make the Achievement Track Annual Performance Report available to the public?

☒ Website [www.\[Not Yet Active\]](#)

☐ Newspaper

☐ Open Houses

☒ Other

Newsletter

4 Are there any ongoing citizen suits against your facility? ☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below

	<i>Organization</i>	<i>Name</i>	<i>Phone number</i>
<i>Representative of a Community/ Citizen Group</i>	People for Puget Sound	Kathy Fletcher, Executive Director	206-382-7007
<i>State/Local Regulator</i>	Washington Dept. of Ecology	Mark Dirkx, Environmental Engineer	360-407-6937
<i>Other community/local reference</i>	Citizens for a Healthy Bay	Wendy Churchill, Executive Director	253-383-2429

Section E

Application and Participation Statement.

On behalf of Simpson Tacoma Kraft Company
[my facility],

I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

Printed Name/Title Donald C. Johnson/Vice President and General Manager

Facility Name Simpson Tacoma Kraft Company

Facility Street Address 801 Portland Avenue

Facility ID Numbers WAD082510595

National Environmental Achievement Track

Environmental Requirements Checklist

We've included the following Checklist to help you answer questions in Section A, Tell us about your facility. The Checklist will help you identify the major federal, state, tribal, and local environmental requirements that apply at your facility, but it is not an exhaustive list of all environmental requirements that may be applicable at your facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application (see instructions).

Air Pollution Regulations

Check All That Apply

- ☒ 1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61)
- ☒ 2. Permits and Registration of Air Pollution Sources
- ☒ 3. General Emission Standards, Prohibitions and Restrictions
- ☐ 4. Control of Incinerators
- ☒ 5. Process Industry Emission Standards
- ☒ 6. Control of Fuel Burning Equipment
- ☒ 7. Control of VOCs
- ☒ 8. Sampling, Testing and Reporting
- ☒ 9. Visible Emissions Standards
- ☒ 10. Control of Fugitive Dust
- ☒ 11. Toxic Air Pollutants Control
- ☐ 12. Vehicle Emissions Inspections and Testing

- ☐ 13. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Hazardous Waste Management Regulations

Check All That Apply

- ☒ 1. Identification and Listing of Hazardous Waste (40 CFR 261)
 - ☒ - Characteristic Waste
 - ☒ - Listed Waste
- ☒ 2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)
 - ☒ - Manifesting
 - ☒ - Pre-transport requirements
 - ☒ - Record keeping/reporting
- ☐ 3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
 - ☐ - Transfer facility requirements
 - ☐ - Manifest system and record-keeping
 - ☐ - Hazardous waste discharges
- ☐ 4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)
 - ☐ - General facility standards
 - ☐ - Preparedness and prevention
 - ☐ - Contingency plan and emergency procedures

- ☐ - Manifest system, Record keeping and reporting
- ☐ - Groundwater protection
- ☐ - Financial requirements
- ☐ - Use and management of containers
- ☐ - Tanks
- ☐ - Waste piles
- ☐ - Land treatment
- ☐ - Incinerators
- ☐ 5. Interim Standards for TSD Owners and Operators (40 CFR 265)
- ☐ 6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267)
- ☐ 7. Administered Permit Program (Part B) (40 CFR 270)
- ☐ 8. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Hazardous Materials Management

Check All That Apply

- ☐ 1. Control of Pollution by Oil and Other Hazardous Substances (33 CFR 153)
- ☒ 2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302)
- ☒ 3. Hazardous Materials Transportation Regulations (49 CFR 172-173)
- ☒ 4. Worker Right-to-Know Regulations (29 CFR 1910.1200)
- ☒ 5. Community Right-to-Know Regulations (40 CFR 350-372)
- ☐ 6. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Solid Waste Management

Check All That Apply

- ☐ 1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257)
- ☐ 2. Permit Requirements for Solid Waste Disposal Facilities
- ☐ 3. Installation of Systems of Refuse Disposal
- ☐ 4. Solid Waste Storage and Removal Requirements
- ☐ 5. Disposal Requirements for Special Wastes
- ☐ 6. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Water Pollution Control Requirements

Check All That Apply

- ☒ 1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112)
- ☒ 2. Designation of Hazardous Substances (40 CFR 116)

- ☒ 3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117)
- ☒ 4. NPDES Permit Requirements (40 CFR 122)
- ☒ 5. Toxic Pollutant Effluent Standards (40 CFR 129)
- ☐ 6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403)
Name of POTW
ID # of POTW
- ☐ 7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414)
- ☐ 8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415)
- ☐ 9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416)
- ☒ 10. Water Quality Standards
- ☒ 11. Effluent Limitations for Direct Dischargers
- ☒ 12. Permit Monitoring/Reporting Requirements
- ☐ 13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants
- ☐ 14. Collection, Handling, and Processing of Sewage Sludge
- ☒ 15. Oil Discharge Containment, Control and Cleanup
- ☐ 16. Standards Applicable to Indirect Discharges (Pretreatment)
- ☐ 17. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Drinking Water Regulations

Check All That Apply

- ☐ 1. Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146)
- ☐ 2. National Primary Drinking Water Standards (40 CFR 141)
- ☐ 3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141)
- ☐ 4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources
- ☐ 5. Underground Injection Control Requirements
- ☐ 6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems
- ☐ 7. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Toxic Substances

Check All That Apply

- ☐ 1. Manufacture and Import of Chemicals, Record-keeping and Reporting Requirements (40 CFR 704)
- ☐ 2. Import and Export of Chemicals (40 CFR 707)
- ☒ 3. Chemical Substances Inventory Reporting Requirements (40 CFR 710)

- ☐ 4. Chemical Information Rules (40 CFR 712)
- ☐ 5. Health and Safety Data Reporting (40 CFR 716)
- ☐ 6. Pre-Manufacture Notifications (40 CFR 720)
- ☒ 7. PCB Distribution Use, Storage and Disposal (40 CFR 761)
- ☐ 8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762)
- ☐ 9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775)
- ☐ 10. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Pesticide Regulations

Check All That Apply

- ☐ 1. FIFRA Pesticide Use Classification (40 CFR 162)
- ☐ 2. Procedures Storage and Disposal of Pesticides and Containers (40 CFR 165)
- ☐ 3. Certification of Pesticide Applications (40 CFR 171)
- ☐ 4. Pesticide Licensing Requirements
- ☐ 5. Labeling of Pesticides
- ☐ 6. Pesticide Sales, Permits, Records, Application and Disposal Requirements
- ☐ 7. Disposal of Pesticide Containers
- ☐ 8. Restricted Use and Prohibited Pesticides
- ☐ 9. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Environmental Clean-Up, Restoration, Corrective Action

Check All That Apply

- ☐ 1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (Please identify)
- ☐ 2. RCRA Corrective Action
- ☐ 3. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Facility Name Simpson Tacoma Kraft Company
Facility Location: Tacoma, WA
Facility ID Number(s): WAD082510595

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK (7875) or e-mail ptrack@indecon.com. Mail completed applications to:

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